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August 18, 2021

BY ECF

Hon. Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Alshahhi, et al.*, 21 Cr. 371 (BMC) (TAM)

Dear Judge Cogan:

I represent Matthew Grimes, one of the defendants in the above-referenced case. I write to respectfully request the Court's permission for Mr. Grimes to travel to Washington. Both the Court's Pretrial Services Officer and the Government have been provided a copy of Mr. Grimes' proposed itinerary, and both consent to this request.

Mr. Grimes was charged in Counts 1 and 2 of the above-referenced indictment and first appeared in the Central District of California late last month. At his first appearance in this District, Judge Bulsara adopted an agreed-upon bail package consisting primarily of (1) a \$5 million bond partially secured by Mr. Grimes's parents' house and three co-signors; (2) GPS location monitoring; and (3) a curfew as directed by Pretrial. Mr. Grimes also surrendered his passport, and his travel was limited to the Eastern and Southern Districts of New York and the Central District of California, among other conditions. Mr. Grimes is scheduled to make his first appearance before Your Honor, by Zoom, on September 2, 2021.

The proposed travel to Washington would be from August 22-28, 2021, for a preplanned personal trip. While travelling, Mr. Grimes would continue to be subject to GPS monitoring, would continue to be subject to a curfew,¹ and would report to his Pretrial Services Officer as directed. Combined with the other conditions of his release including a substantial secured bond, I respectfully submit that Mr. Grimes is no risk of flight. He has already travelled once cross-country to appear in this District, and on another occasion travelled cross-country to the District

¹ At the Court may recall, the current curfew condition requires Mr. Grimes to spend each night at either his own or his parents' residence, both of which are in the Central District of California. For this reason, the Pretrial Services officers supervising Mr. Grimes in California had previously asked that he be relieved from the curfew condition whenever he was outside of California. This Court's Pretrial Services office has clarified, however, that it construes the curfew condition to require Mr. Grimes to stay at his or his parents' home when he is in California, and to stay at lodging approved by Pretrial Services whenever he travels outside of the District. Consistent with this understanding, Mr. Grimes will continue to be subject to a curfew as directed by Pretrial Services while travelling.



of Massachusetts (with the Court's approval) to meet with me. On both occasions Mr. Grimes returned home on time and without incident.

Accordingly, on behalf of Mr. Grimes, I respectfully request that he be permitted to travel to the District of Washington consistent with the itinerary transmitted to the Government and Pretrial Services.

Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz

cc: Counsel of record (by ECF)
Pretrial Services (by e-mail)